

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

CHRISTOPHER ROBINSON)	
Plaintiff,)	
V.)	CIVIL ACTION NO.:
SPRING OAKS CAPITAL,)	
LLC, et. al.)	2:23-cv-01381-AMM
Defendant.)	
)	

CHRISTOPHER ROBINSON'S EVIDENTIARY SUBMISSION IN SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT

COMES NOW, the Plaintiff, Christopher Robinson ("Robinson") and relies on and files the following Exhibits in support of his Motion for Summary Judgment:

Exhibit 1: Deposition Transcript of Spring Oaks Capital Corporate Representative 30(b)(6) filed by Defendant as Ex. "A", (Doc. 44-1, pp. 1-46).

Ex. A-1: Calko Dep. Exhibit 1 - Rule 30(b)(6) Notice. **(Doc. 44-1, pp.47-54)**.

Ex. A-2: Calko Dep. Exhibit 2 – September 27, 2022 Letter to Spring Oaks (SOC_ROBINSON 000044). (Doc. 44-1, p. 55).

Ex. A-3: Calko Dep. Exhibit 3 – October 31, 2022 Validation Packet Sent to Robinson (SOC_ROBINSON 000001-12). (Doc. 44-1, pp.56-67).

- Ex. A-4: Calko Dep. Exhibit 4 Spring Oaks Account Notes (SOC ROBINSON 000013-24). (Doc. 44-1, pp.68-79).
- Ex. A-5: Calko Dep. Exhibit 5 Account Statements (SOC_ROBINSON 000025-43). (Doc. 44-1, pp.80-98).
- Ex. A-6: Calko Dep. Exhibit 6 Excerpts from November 25, 2022 TransUnion Credit Report (Robinson v. Spring Oaks 000150, 202). (Doc. 44-1, pp.99-100).
- Ex. A-7: Calko Dep. Exhibit 7 Excerpts from July 28, 2023 TransUnion Credit Report (Robinson v. Spring Oaks 000004, 59-61). (Doc. 44-1, pp.101-104).
- Ex. A-8: Calko Dep. Exhibit 8 Excerpts from November 29, 2023 TransUnion Credit Report (Robinson v. Spring Oaks 000082, 119-120). (Doc. 44-1, pp.105-107).
- Ex. A-9: Calko Dep. Exhibit 9 Spring Oaks' Responses to Robinson's Discovery Requests. (Doc. 44-1, pp.108-125).
- Ex. A-10: Calko Dep. Exhibit 10 Excerpts from the Fair Debt Collection Practices Act. (Doc. 44-1, pp.126-153).
- Ex. A-11: Calko Dep. Exhibit 11 CDIA Credit Reporting Resource Guide. (Doc. 44-1, pp.154-180).
- Exhibit 2: Spring Oaks Capital Responses to Written Discovery.
- Exhibit 3: Deposition Transcript of Plaintiff, Christopher Robinson Filed by Defendant as Exhibit "B,". (Doc. 44-2, pp. 1-36).
 - Ex. B-a: Robinson Dep. Exhibit A April 5, 2022 Letter from Spring Oaks. (Doc. 44-2, pp. 37-40).
 - Ex. B-b: Robinson Dep. Exhibit B September 27, 2022 Letter to Spring Oaks. (Doc. 44-2, p. 41).
 - Ex. B-c: Robinson Dep. Exhibit C September 27, 2022 Letter to Spring Oaks. (Doc. 44-2, pp. 42-43).
 - Ex. B-d: Robinson Dep. Exhibit D October 31, 2022 Validation

Packet Sent to Robinson. (Doc. 44-2, pp. 44-64).

Ex. B-e: Robinson Dep. Exhibit E – The Complaint. (Doc. 44-2, pp. 65-76).

Ex. B-f: Robinson Dep. Exhibit F – TransUnion Credit Report. (Doc. 44-2, pp. 77-143).

Ex. B-g: Robinson Dep. Exhibit G – Robinson's Responses to Spring Oaks' Discovery Requests. (Doc. 44-2, pp. 144-165).

Exhibit 4: Trans Union Credit Report dated 10/10/24 for Christopher Robinson.

Respectfully submitted,

/s/ M. Stan Herring

John G. Watts (WAT056)
M. Stan Herring (HER037)
W. James Sears (SEA036)
Watts & Herring, LLC

The Kress Building 301 19th Street North Birmingham, Alabama 35203 (205) 879-2447 (888) 522-7167 facsimile john@wattsherring.com stan@wattsherring.com james@wattsherring.com Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on **October 11, 2024,** a copy of the foregoing has been served on the following counsel for by using the CM/ECF system, U.S. Mail, postage prepaid and properly addressed and/or email to the email addresses below:

John K Rossman

ROSSMAN ATTORNEY GROUP PLLC 4628 Bruce Avenue Edna, MN 55424 952-201-1507

Email: john.rossman@rossmanattorneygroup.com

Neal D Moore, III CHRISTIAN AND SMALL LLP 505 20th Street North Suite 1800 Birmingham, AL 35203 205-795-6588

Fax: 205-328-7234

Email: ndmoore@csattorneys.com

Counsel for the defendant Spring Oaks Capital, LLC

/s/ M. Stan Herring
OF COUNSEL